



Kevin Fritz
Partner
Direct (212) 655-3570
kaf@msf-law.com

June 17, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL**

Dear Judge Liman:

On behalf of Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal Exhibits B and C to the Wayfarer Parties’ Letter Brief, dated June 17, 2025 (“Letter Brief”), submitted in opposition to Blake Lively’s motion for a protective order concerning her communications with Taylor Swift, filed contemporaneously herewith, as well as portions of the Letter Brief quoting from those exhibits. In addition, Wayfarer Parties respectfully request that they be allowed to file a permanently redacted version of Exhibit E to the Letter Brief.

Exhibit B is Blake Lively’s Responses and Objections to Wayfarer Parties’ First Set of Requests for Production, which Ms. Lively designated as “confidential.” Exhibit C is Blake Lively’s Amended Initial Disclosures, which Ms. Lively also designated as “confidential.” In accordance with Rule 4.b of Attachment A, the Wayfarer Parties respectfully request that the Court not rule on this letter-motion to seal Exhibits B and C to the Letter Brief, as well as the portions of the Letter Brief quoting from those exhibits, for one week so that Ms. Lively may file a motion for continued sealing if she so chooses.

Exhibit E is Wayfarer Parties’ Initial Disclosures, which Wayfarer Parties designated “confidential” because they contain confidential personal contact information of third parties. Courts consistently hold that personal contact information of third parties including phone numbers and email addresses warrant sealing. *See In re Keurig Green Mt. Single-Serve Coffee Antitrust Litig.*, No. 14-MC-2542 (VSB), 2023 WL 196134, at *12 (S.D.N.Y. Jan. 17, 2023) (redaction of names, emails, and phone numbers of non-party individual employees of Keurig was warranted); *In re Zyprexa Products Liab. Litig.*, No. MDL1596JBWASC, 2005 WL 2237789, at *2 (E.D.N.Y. Mar. 2, 2005) (redaction of “confidential personal contact information such as home

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telephone numbers and addresses, pager and personal cell phone numbers, Social Security numbers” of Lilly’s non-party employees was warranted).

Accordingly, Wayfarer Parties respectfully request that they be allowed to permanently redact the portions of Exhibit E to the Letter Brief, together with the portions of the Letter Brief referencing Exhibit E to protect confidential personal identifiers of third parties.

Respectfully submitted,

/s/ Kevin Fritz

MEISTER SEELIG & FEIN PLLC

Mitchell Schuster

Kevin Fritz

125 Park Avenue, 7th Floor

New York, NY 10017

Tel: (212) 655-3500

Email: ms@msf-law.com

kaf@msf-law.com

LINER FREEDMAN TAITELMAN + COOLEY, LLP

Bryan J. Freedman (*pro hac vice*)

Ellyn S. Garofalo (*pro hac vice*)

Miles M. Cooley (*pro hac vice*)

Theresa M Troupson (*pro hac vice*)

Summer Benson (*pro hac vice*)

Jason Sunshine

1801 Century Park West, 5th Floor

Los Angeles, CA 90067

Tel: (310) 201-0005

Email: bfreedman@lftcllp.com

egarofalo@lftcllp.com

mcooley@lftcllp.com

ttroupson@lftcllp.com

sbenson@lftcllp.com

[jsunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)

Mitra Ahouraian (*pro hac vice*)

2029 Century Park East

4th Floor

Los Angeles, CA 90067

(310) 376-7878

Email: mitra@ahouraianlaw.com

cc: all counsel of record (via ECF)